

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DENISE FAHEY-RAMIREZ, individually  
and on behalf of all others similarly situated,

Plaintiff,

v.

NESPRESSO USA, INC.,

Defendant.

Case No. 25 Civ. 01684 (JHR)

**MOTION FOR ADMISSION**

**PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern District of New York, I, Joseph E. Nelson hereby move this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for Denise Fahey-Ramirez in the above-captioned action.

I am in good standing of the bar of the state of Minnesota and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the affidavit and Certificate of Good Standing, pursuant to Local Rule 1.3.

Respectfully Submitted,

Dated: May 29, 2025

/s/ Joseph E. Nelson  
Joseph E. Nelson (*pro hac vice* sought)  
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*Counsel for Plaintiff Denise Fahey-Ramirez*